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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
---X
                                                                :
                                                                :   CASE NO.: 18-30646
            IN RE: :
                                                                :   CHAPTER: 13
            Sylvia Kett-Solotoff   :
            aka Sylvia Kett   :   HON. JUDGE.:
            aka Sylvia Solotoff   :   Jerrold N. Poslusny Jr.
                                                                :
            Debtors   :   HEARING DATE:
                                                                :   April 7, 2020 at 10:00 AM
                                                                :
                                                                :
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LIMITED OPPOSITION TO DEBTOR'S MOTION TO REINSTATE STAY

      Jonathan Schwalb, an attorney admitted to practice before the United States Bankruptcy

Court for the District of New Jersey, hereby affirms the following to be true under the penalty of

perjury:

   1. BSI Financial Services as Servicer for U.S. Bank Trust National Association, as Trustee

of Bungalow Series F Trust (hereinafter "Secured Creditor"), by and through its attorneys,

Friedman Vartolo LLP, submits this affirmation in response to the motion of Sylvia Kett-Solotoff

(hereinafter "Debtor"), dated March 14, 2020, seeking to reinstate the stay as to the real property

located at 1522 Haddonfield- Berlin Road, Cherry Hill Township, NJ 08003 (hereinafter

"Property").

   2. The Debtor filed a Chapter 13 Bankruptcy Petition on October 17, 2018.

3.   After the debtor's first default in payments, Secured Creditor filed a Motion for Relief from Stay on March 27, 2019 (Docket #42). Subsequently, Secured Creditor resolved the issues with the Debtor's attorney and an Order was entered on May 14, 2019 (Docket #46) resolving the Motion for Relief from Stay.

4.   After the debtor's second default in payments, Secured Creditor filed a Creditor's Certification of Default on September 10, 2019 (Docket #57). Subsequently, Secured Creditor resolved the issues with the Debtor's attorney and an Order was entered on October 18, 2019 (Docket #62) resolving the Creditor's Certification of Default.

5.   After the debtor's third default in payments, Secured Creditor filed a Creditor's Certification of Default on February 19, 2020 (Docket #66). No opposition was filed, and an Order was entered on March 5, 2020 (Docket #67) vacating the automatic stay with respect to the Property.

6.   As of the date of the filing of this limited opposition, according to Secured Creditor's records, the Debtor is currently due for 2 monthly payments (February 2020 – March 2020) x $942.81, less suspense of $826.35. The total amount past due is $1,059.27.

7.   Secured Creditor requests that any Order reinstating the automatic stay as to the Property only be entered if the Debtor brings their account current by April 7, 2020.

WHEREFORE, Secured Creditor respectfully requests that the Debtor's Motion be granted to the extent outlined above and for all other and further relief as is just and proper.

Dated: New York, NY
        March 16, 2020

By: /s/ Jonathan Schwalb
Jonathan Schwalb, Esq.
FRIEDMAN VARTOLO LLP
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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Attorneys for BSI Financial Services as Servicer
for U.S. Bank Trust National Association, as
Trustee of Bungalow Series F Trust

In Re:

Sylvia Kett-Solotoff
aka Sylvia Kett
aka Sylvia Solotoff

Case No.:	18-30646
Chapter:	13
Adv. No.:	
Hearing Date:	April 7, 2020 at 10:00 AM
Judge:	Jerrold N. Poslusny Jr.

CERTIFICATION OF SERVICE

1. I, _____Theodore Weber_____ :

    ☐ represent _____ in this matter.

    ☒ am the secretary/paralegal for _____Jonathan Schwalb, Esq._____, who represents
        _____BSI Financial Services_____ in this matter.

    ☐ am the _____ in this case and am representing myself.

2.   On _____March 16, 2020_____, I sent a copy of the following pleadings and/or documents
       to the parties listed in the chart below.
       - Limited Opposition to Debtor's Motion to Reinstate Stay

3.   I certify under penalty of perjury that the above documents were sent using the mode of service
       indicated.

Date: _____March 16, 2020_____   /s/ Theodore Weber _____
                                           Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Sylvia Kett-Solotoff aka Sylvia Kett aka Sylvia Solotoff 1522 Berlin Rd Cherry Hill, NJ 08003-3623	Debtor(s)	☐ Hand-delivered ☒ Regular mail ☐ Certified mail/RR ☐ Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
Mark S Cherry Law Office of Mark S Cherry 385 Kings Highway North Cherry Hill, NJ 08034	Debtor(s) Attorney	☐ Hand-delivered ☒ Regular mail ☐ Certified mail/RR ☒ Other NEF _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Trustee	☐ Hand-delivered ☒ Regular mail ☐ Certified mail/RR ☒ Other NEF _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	☐ Hand-delivered ☒ Regular mail ☐ Certified mail/RR ☒ Other NEF _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		☐ Hand-delivered ☐ Regular mail ☐ Certified mail/RR ☐ Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)